

Response ID ANON-VEPG-2GTR-H

Submitted to Future Grant Support for Forestry
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Ministerial Foreword - Forestry in Scotland is a sector that we can be justly proud of.

1 - Introduction and Rationale for Providing Grant Support for Forestry

1. Do you agree that grant support for forestry should continue to be improved and developed as a discrete scheme within the overall package of land support?

Yes

Please explain your answer in the text box.:

Yes but the focus needs to be shifted to greater financial support for the creation, and restoration, of native woodland which have a far greater biodiversity value and better long term prospects for addressing climate change. It should not be dominated by cash crop and short term carbon capture afforestation.

2. Are there any changes that would allow for better complementarity between the forestry and agriculture funding options?

Not sure

Please explain your answer in the text box.:

Not familiar enough with all the agricultural funding options so unable to make useful comment.

2 - Forests Delivering for Scotland's Climate Change Plan

3. How can the support package for forestry evolve to help tackle the climate emergency, to achieve net zero, and to ensure that our woodlands and forests are resilient to the future climate?

Please explain your answer in the text box.:

Remember that nature knows best and native woodland will adapt to climate change better than non-native species, As it has done for thousands of years. Monoculture is not helpful for biodiversity, walking under the canopy of a blanket Sitka spruce plantation is a dead zone compared to a mixed native woodland. Greater funding for protecting and increasing our native woodland would be helpful. Invasive non native species (INNS) are a major problem that threaten biodiversity and the resilience of our woodlands. SF are aware of the problems that invasive commercially planted self seeding Sitka, and Western Hemlock and garden escapee Rhododendron ponticum are causing colonising peatland and native woodlands but are woefully underfunded and under resourced to tackle the problem. Perhaps FGS awards should include a percentage for restoration and native regeneration of a proportionate number of hectares for each new monoculture hectare planted to try and find some balance. Continuing to plant large blocks of monoculture conifer will not bring us to net zero in the long term, it will on paper but the climate crisis and biodiversity loss would be better addressed by ensuring our native woodlands are protected, restored and expanded. Longer term thinking that places protecting and enhancing biodiversity (the single most important thing to tackle climate change) as the core objective would be welcome.

4. Private investment through natural capital and carbon schemes can make a valuable contribution to climate change. Do you agree that the grant support mechanism should have more flexibility to maximise the opportunities to blend private and public finance to support woodland creation,

Yes

Please explain your answer in the text box.:

Currently it seems wealthy investment companies have jumped on a bandwagon of carbon credits that offer tax avoidance opportunities to their wealthy clients. Do these financial investment companies need public money to create forestry plantations and do they really care about climate change and biodiversity loss? I don't think so. Yes that investment is good in that it means the rush to plant 18000 ha per annum will happen more quickly but the speed at which this is happening means SF are understaffed, lacking in enough experienced foresters and under resourced to cope with the volume. There is simply not enough time or resources in SF to adequately process the volume. As a result there is too much of a get rich quick mentality from the investors rather than full consideration of environmental impacts. Screening decisions finding that full EIAs are not required before a forest is approved is shocking, EIAs should be mandatory, as should assessment of the impacts of new forestry on communities and much greater attention paid to community benefits. Forest walks, horse riding and mountain biking trails, at the most basic level gates for access, should all be designed in. New plantations are busy removing access to the countryside and its health and well-being benefits, not enhancing it. SF needs much greater power and input to ensure private investment addresses biodiversity loss by insisting on more native woodland planting, less reliance on single species. The FGS is currently supporting monoculture tax haven financial investments it is not supporting community wealth building or tackling the biodiversity crisis. The emphasis and core objectives need to change.

5. How could the current funding package be improved to stimulate woodland expansion and better management across a wide range of woodland types, including native and productive woodlands?

Please explain your answer in the text box.:

Greater flexibility and support (less bureaucracy) for small schemes that seek to regenerate and expand native woodland. Incentives for increasing and restoring native woodland. Less incentives to big financial players who see meeting the net zero targets as simply a way to make money (assuming there will be a market for all the timber surplus we will have in forty years time when Scotland is covered in mature monoculture forestry and our biodiversity is in an even more degraded state because of the current plant as much non native invasive Sitka spruce as fast as we can approach). Native woodlands need to be front and centre if we seriously want to tackle climate change, biodiversity loss and really strive for net zero. Thousands of hectares of Sitka spruce are not going to deliver this in the long term. Really it is a fool's mission to think planting 18000 hectares of monoculture conifers a year is going to save the planet, it is creating an avoidable biodiversity crisis.

Simply, more money for native trees and less for monoculture cash crops. Difficult balancing act but looking at what the real objective is, i.e. tackling biodiversity loss which is the greatest cause of climate change, requires a change in thinking in what the FGS should seek to achieve and actually deliver.

6. Do you agree that it should be a requirement of grant support that woodlands are managed to ensure that they become more resilient to the impacts of climate change and pests and disease?

Yes

How can the grant scheme support this?:

Incentives for and provision of training for foresters. The forestry industry needs to attract more practitioners, and SF appears to have a huge turnover of staff and are understaffed and under resourced to cope with this forestry expansion. Perhaps a requirement that each FGS award requires recruitment and training of a forester. Trees are getting planted with money from the public purse but there appears to be very little in the way of increasing employment, training and community benefit. It seems the FGS is funding a lot of people who have the financial resources to plant forests without financial help to the detriment of less wealthy people operating on a smaller scale who do need financial support. I object to private investment companies being funded with tax payers money to provide tax free investment opportunities for their investors. There is no community wealth building in this model and the FGS needs to ask some ethical questions about how it delivers funding.

3 - Integrating Woodlands on Farms and Crofts

7. Which of the following measures would help reduce the barriers for crofters and farmers wanting to include woodland as part of their farming business? Please select all that apply.

Better integration of support for woodland creation with farm support mechanisms, Knowing where to get reliable advice, Clearer guidance on grant options, Flexibility within options, Support with cashflow, Information on how current land use could continue with trees integrated throughout

Are there others not listed above?:

8. Establishing small woodlands can have higher costs. What specific mechanisms would better support small scale woodlands and woodland ownership?

Please explain your answer in the text box.:

I am not a farmer but perhaps funding for native tree (home sourced and grown) nurseries that take up less space and are essential for plant health is a funding area that could be enhanced.

The NFU described the 18000 ha per annum target and impact on land use as a second Highland Clearances so clearly there are major concerns about what land is being selected for afforestation.

On my own doorstep SF ignored its own preferred land types and the local authority landscape capacity study and granted permission to plant on improved pasture grazing land. Once land that can be used for food production is planted with conifer crops it will take a very long time before it could be cultivable land again. Longer term thinking beyond the net zero target date is needed. It will be no good patting ourselves on the back and saying we reached the target on time if we have destroyed biodiversity and food producing land in the process.

4 - Forests Delivering for People and Communities

9. How can forestry grants better support an increase in easily accessible, sustainably managed woodlands in urban and peri-urban areas?

Please explain your answer in the text box.:

Make meaningful community consultation mandatory.

Make recreational benefits mandatory - no more deer fences with no access gates for walkers and no paths or trails.

The aspirations in the introduction are laudable but the reality is none of this actually happens. Forestry is a closed shop, do what we like, pay no attention / blatantly ignore the community concerns and comments.

The reality of the relationship between communities and forestry can be summed up in one word. DISENFRANCHISED.

10. How can grant support for forestry better enable rural communities to realise greater benefits from woodland to support community wealth building?

Please explain your answer in the text box.:

Speaking to and listening to communities would be a good start!

Forestry in my area has brought major problems with local roads in the village unsuitable for timber lorries being used for timber extraction. It has removed access to hundreds of acres of hill ground and removed recreational opportunities. It has polluted watercourses and SEPA had to come and tell them off. It has damaged land boundaries that form part of the historic environment.

The Community Council specifically asked for mountain biking / walking / horse riding trails in a wildlife corridor connecting Ancient and LEPO woodlands with riparian woodlands in a new plantation. We got nothing at all. No community benefit, community wealth building or economic opportunity to increase our outdoor activities attractions. Just a big fence, no access at all and no new local jobs or opportunities to create leisure related jobs.

Perhaps allocate a percentage of the FGS award to meaningful community consultation and local economic development. Actively look for how community benefits can be achieved.

11. How can the forest regulatory and grant processes evolve to provide greater opportunities for communities to be involved in the development of forestry proposals?

Please explain your answer in the text box.:

This system needs a total overhaul. FGS should operate through the planning system and not on its own register. People know to address planning applications through the local authority so putting forestry schemes somewhere else is immediately confusing. Our lived experience is people submitted comments on a FGS plantation to the local authority where the forestry proposal was 'advertised' on the planning list with the proposals and comments invited in the normal way. SF later advised they never received all these submissions because they were not submitted through the SF register. The result was the community comments were not considered. The public thought they were engaging but they weren't, they were disenfranchised by an opaque and Byzantine system.

It needs to be made crystal clear that comments submitted to a planning authority by way of the planning portal will not be considered or forwarded on or looked at by SF. Only comments direct to SF through their system will be noted.

However as forestry is permitted development does it matter what community views are? It does not appear they matter at all.

Removing permitted development rights would be the first thing to do to achieve the community objectives noted in the introduction to this section. Second is sort out the advertising and response mechanism to bring it in line with the rest of the planning system.

12. How can the forestry regulatory and grant processes evolve to ensure that there is greater transparency about proposals and the decisions that have been made on them?

Please explain your answer in the text box.:

Use the planning system for greater accessibility and transparency. Most people don't know to look at the SF register and only find out about forestry after it is all decided and about to happen. The SF website is also a bit of a labyrinth and not always easy to find information.

13. Forestry grants have been used to stimulate rural forestry businesses by providing support with capital costs. Do you agree that this has been an effective measure to stimulate rural business?

Not sure

a. How could this approach be used to support further forestry businesses?:

Forestry business might be expanded to include tourism and working with local activities / adventure providers to increase local economic benefits.

b. How could this approach be used to support further skills development?:

Depending on the size of the grant a requirement for apprenticeships and delivering training could be a mandatory qualification for the grant.

14. How could the FGS processes and rules be developed to encourage more companies and organisations to provide training positions within the forestry sector?

Please explain your answer in the text box.:

See 13b - make it a mandatory requirement of grant awards that training / CPD / apprenticeships are part of the qualification process.

5 - Forests Delivering for Biodiversity and the Environment

15. The primary purpose of FGS is to encourage forestry expansion and sustainable forest management, of which a key benefit is the realisation of environmental benefits. How can future grant support better help to address biodiversity loss in Scotland including the

regeneration and expansion of native woodlands?

Please explain your answer in the text box.:

The introduction indicates the problems are identified but the problem with commercial forestry and biodiversity is monoculture planting and reliance on too few species. Sitka and Western Hemlock are INNS, a lot more needs to be done to control them and stop further spread. The value of woodland floors needs greater recognition and protection, ancient woodlands, native, semi native and LEPO woodlands all need greater protection. NPF4 has at least improved protection for ancient woodlands but not enough for native and semi natural.

Monoculture of non native (and invasive) conifers is not sustainable. There is a reason New Zealand and Ireland are spending millions on eradicating them and I believe Norway has banned Sitka. Recent nature restoration grants from NatureScot to the RSPB are the beginnings of tackling and trying to reverse the adverse impacts of the over reliance of Scottish forestry on Sitka monoculture.

Greater diversity in plantations is needed and a lot more natives. What about one native for each conifer that is planted? I appreciate Sitka grows well here (too well as it is marching across Scotland where it shouldn't be), is easy for sawmills to process etc and forestry is an important part of Scotland's economy but does the environmental damage it does support its selection as the commercial conifer of choice?

Perhaps not the place for this comment but perhaps further investment in sawmills should be considered? Foresters have told me it is the sawmills that dictate the timber market and it is influenced by what equipment they have. If Sitka remains the cheapest wood to process we will not progress in developing greater planting diversity and stopping the decline in biodiversity.

16. Herbivore browsing and damage can have a significant impact on biodiversity loss and restrict regeneration. How could forestry grant support mechanisms evolve to ensure effective management of deer populations at:

Landscape scale?:

Cull the deer - work with landowners to reduce deer numbers., the Deer Working Group must have a number of proposals for how to manage deer numbers and a lot has been written about it.

Small scale mixed land use?:

Thorn hedges.

Cull deer

Provide feeding for deer if numbers can not be reduced for some reason.

If you wish to make any other relevant comments, please do so in the text box below.

Please add your comments here.:

About you

What is your name?

Name:

[Redacted]

What is your email address?

Email:

[Redacted]

Are you responding as an individual or an organisation?

Individual

What is your organisation?

Organisation:

Scottish Forestry would like your permission to publish your response. Please indicate your publishing preference:

Publish response with name

We may share your response internally with other Scottish Forestry policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Forestry to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent